

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

STATE OF MISSOURI, STATE OF
LOUISIANA, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN, JR., in his official
capacity as President of the United States,
et al.,

Defendants.

Case No. 3:22-cv-01213-TAD

SECOND SUPPLEMENTAL DECLARATION OF JILL HINES

1. My name is Jill Hines. I am over the age of 18 years and competent to testify to the matters expressed herein.

2. I have previously submitted two Declarations in this case, filed with the Court as Doc. 10-12 (45-12) and Doc. 227-9. Those prior Declarations are incorporated by reference herein.

3. My previous two Declarations detailed some examples of injury I have experienced due to censorship of speech, both from censorship of my own speech and of speech of others with which I would otherwise have been able to engage. They even detail self-censorship I have felt compelled to do to avoid further harm.

4. As described in my previous Declarations, my advocacy work through Health Freedom Louisiana and Reopen Louisiana includes work to educate and inform the public of their rights regarding certain state and federal laws, and work to coordinate rallies, protests, and testimonies at legislative hearings to seek legislative change for the people of Louisiana. The

platform of social media has been essential to complete this work and to effectively communicate with our state representatives.

5. The harms I experience due to censorship of speech on social media are ongoing.

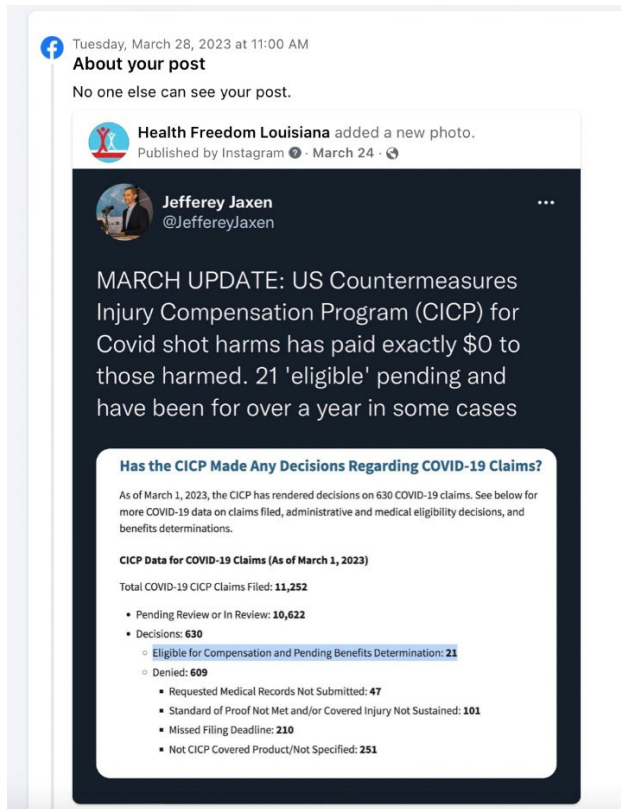
6. Leading up to the Louisiana legislative session in April 2023, I received a series of troubling penalties on Facebook that caused my personal page and public pages, Health Freedom Louisiana and Reopen Louisiana, to be restricted.

7. The penalties included downgrading the visibility of my posts in Facebook's News Feed (thereby limiting its reach to other users), downgrading the visibility of my posts in my Facebook Groups, and an approximately 24-hour moratorium on my ability to create Facebook Events.

8. On February 8, 2023, my Health Freedom Louisiana page received a violation for simply sharing a Tweet from attorney Aaron Siri regarding the amount of money vaccine manufacturers grossed while setting no money aside for Covid vaccine injury victims. No one else was permitted to view or engage with the post.

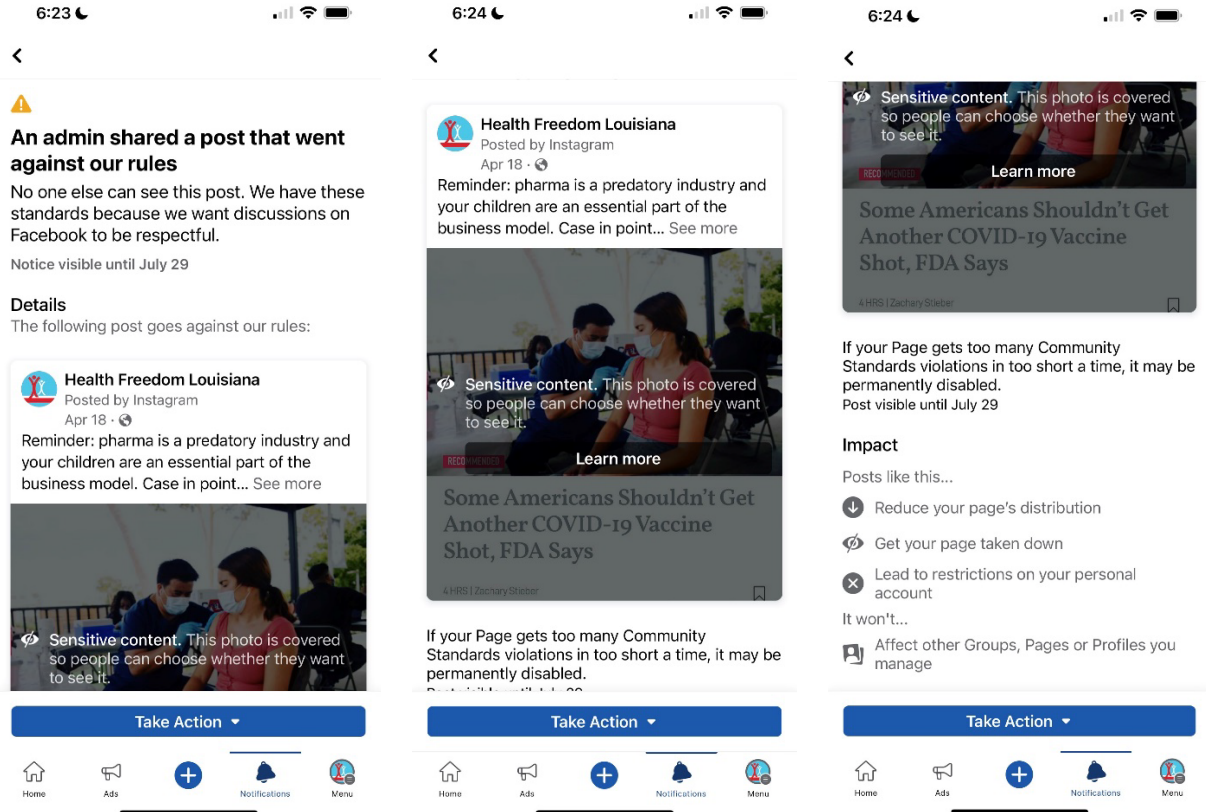


9. On March 28, 2023, the page received another violation for sharing a Tweet regarding the amount of money that had been paid out of the U.S. Countermeasures Injury Compensation Program (CICP). No one else was permitted to view or engage with the post.

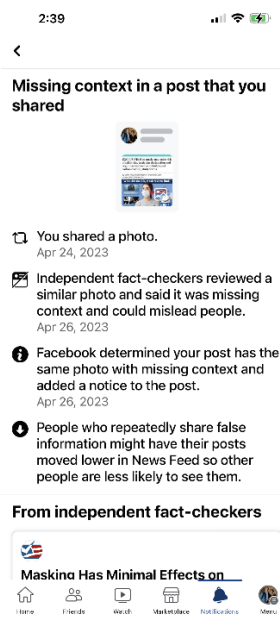


10. On April 3, 2023, the page received another violation for sharing a Fox News Tweet regarding the World Health Organization's latest Covid vaccine recommendations for children.

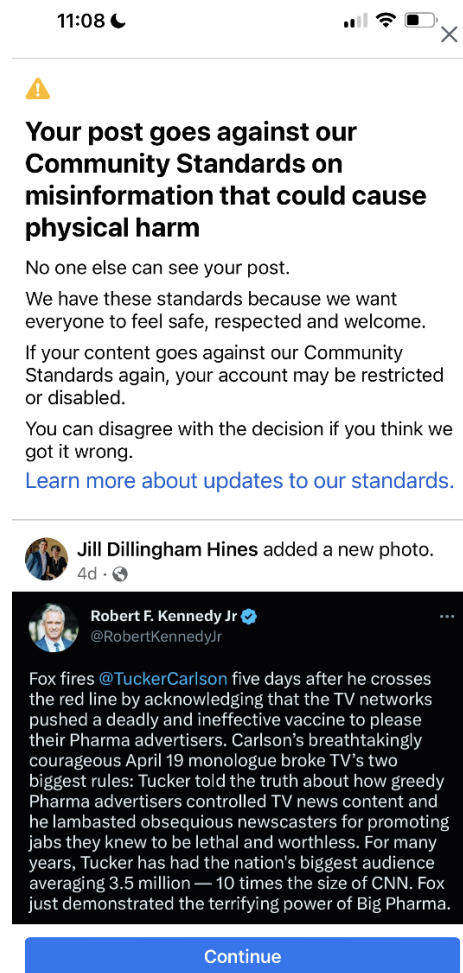
11. On April 18, 2023, a post on Health Freedom Louisiana's Facebook page linking to a piece entitled "Some Americans Shouldn't Get Another COVID-19 Vaccine Shot, FDA Says," and commenting on how children factor into the business model of the pharmaceutical industry was issued a violation. No one else was permitted to view or engage with the post.



12. On April 26, 2023, one of my posts with a screenshot of a Daily Mail headline about the dangers of masks had a “missing context” banner placed on it, and my page received a warning. As a result, I removed the post from other pages I had shared it to.



13. On April 28, 2023, I received a warning for a screenshot of a Robert F. Kennedy, Jr. Tweet, and I removed the post because of the warning. I further removed the post from other pages that I had shared it to in an effort to avoid any more violations. No one else was permitted to view or engage with the post.



14. All of these examples pertain to speech of public interest. This censorship of my speech interrupts my ability, and the ability of Health Freedom Louisiana, to reach the public during the Louisiana legislative session on issues of public concern. It is truly demoralizing, and it suppresses speech and engagement in the political process.

15. This ongoing harm I experience is one reason this case is “of great interest to me” (Hines Suppl. Decl., ¶9). The injuries I have experienced are imminent and ongoing. The injuries stem from the category of speech disfavored by and targeted by Defendants in this case. Consider, as a prime example, the evidence showing the Surgeon General’s office collaborating with the Virality Project to target “health freedom” groups, such as my group Health Freedom Louisiana. I anticipate an order putting a halt to the Federal Defendants’ contribution to the censorship enterprise of social media speech would, accordingly, bring me immediate and noticeable relief.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed On: May 17, 2023

/s/ Jill Hines

Jill Hines